

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SATCO PRODUCTS, INC.,  
Plaintiff,

v.

SIGNIFY NORTH AMERICA CORP.,  
and SIGNIFY NETHERLANDS B.V.  
Defendants.

Civil Action No. 6:21-cv-00146-ADA

**DEFENDANTS' FIRST UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants Signify North America Corporation and Signify Netherlands B.V. (collectively, "Signify" or "Defendants") file this unopposed motion for extension of time to answer or otherwise respond to Plaintiff Satco Products, Inc.'s ("Plaintiff") Complaint (ECF No. 1).

Plaintiff filed its Complaint on February 12, 2021 (ECF No. 1) and filed a request that a summons issue as to Signify North America Corp. on February 12, 2021 (ECF No. 4). Plaintiff served Signify North America Corp. with process on February 17, 2021, making Signify North America Corp.'s initial deadline to respond March 10, 2021. Plaintiff has not yet served Signify Netherlands B.V. with process or requested service under the Hague Convention, but requested on February 16, 2021 that Signify Netherlands B.V. execute a waiver of service.

Plaintiff and Defendants have met and conferred and have agreed that the foreign corporation Signify Netherlands B.V. will waive service of process in exchange for a 90-day extension of time for all Defendants to respond to the Complaint, consistent with the deadline extensions set forth in Fed. R. Civ. P. 4(d)(3) and 12(a)(1)(A)(ii). There is good cause to allow this extension because this agreed extension will avoid the formalities of service via the Hague

Convention or of waiving formal service using Forms AO 398 and 399 in order to arrive at the same answer deadline that would otherwise be in effect if service were waived. Plaintiff and Defendants have further agreed that Signify North America Corp.'s Answer will be due on that same date in the interest of efficiency for both the Court and the parties.

Accordingly, Defendants respectfully request an extension of time up to and including May 17, 2021, to answer or otherwise respond to Plaintiff's Complaint. Counsel for Plaintiff confirmed via email on February 19, 2021 that Plaintiff does not oppose this requested extension of time.

Accordingly, Defendants respectfully request that the Court issue the attached proposed order extending Defendants' time to answer or otherwise respond to Plaintiff's complaint to May 17, 2021.

Dated: February 23, 2021

Respectfully submitted,

By: /s/ Brady Cox

Brady Cox (TX Bar No. 24074084)

**ALSTON & BIRD LLP**

2200 Ross Avenue, Suite 2300

Dallas, Texas 75201

Phone: (214) 922-3400

Fax: (214) 922-3899

brady.cox@alston.com

*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on February 23, 2021.

/s/ Brady Cox

Brady Cox